

I wish to go on record as being strongly opposed to the proposed implementation of Broadband Over Power Line.

In spite of assurances by the industries in a position to profit from this poorly conceived technology, real world evidence indicates that the interference potential is great. The 2 - 80 MHZ spectrum is unique in its propagation characteristics and far too valuable to simply discard for a technology that has been dismissed in other countries where rollouts were attempted. No doubt the Commission is aware of the 2002 ruling by the Ministry of Public Management in Japan, which found the hazards of interference throughout the High Frequency bands to be intolerable to all services that rely on communications in the HF spectrum.

BPL has been tested and deployed on a limited basis in other countries and has been rejected due to interference issues. BPL vendors may claim "new technology" and advances have now made it possible, but the fact is they can't change the laws of physics. High speed data must occupy a certain amount of bandwidth and power lines which were designed to operate at 60Hz will radiate RF that is applied to them. Field tests in the U.S. have clearly demonstrated that this technology cannot coexist without significant interference to HF communications. It should also be noted that BPL is not immune to interference from transmissions made by HF equipment in near space proximity to power lines carrying data. Of equal concern is the fact that the very spectrum being considered for BPL use will without a doubt propagate radiated data energy over great distances during portions of the 11 year sunspot cycle.

It is my opinion that BPL should not be chosen as the answer to the problem of providing a broadband solution for eager subscribers. There is no question that the United States should be looking to the future and moving forward with fiber optics or wireless technologies to close the gap over that last mile of broadband access. These existing technologies are not destructive to the spectrum and are far superior to the utilization of an aging infrastructure that strains to deliver its 60 HZ energy to each household.